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14 IN RE HIGH-TECH EMPLOYEE  
ANTITRUST LITIGATION

16 THIS DOCUMENT RELATES TO:  
17 ALL ACTIONS

Master Docket No. 11-CV-2509-LHK

**DECLARATION VICTORIA L.  
WEATHERFORD IN SUPPORT OF  
APPLE INC.'S MOTION FOR SUMMARY  
JUDGMENT**

Date: March 20, 2104 and  
March 27, 2014  
Time: 1:30 p.m.  
Courtroom: 8, 4th Floor  
Judge: The Honorable Lucy H. Koh

1

2 I, Victoria L. Weatherford, declare as follows:

3 1. I am a member of the Bar of the State of California and an associate of the law  
4 firm of O'Melveny & Myers LLP, attorneys for Defendant Apple Inc. I submit this declaration in  
5 support of Defendant Apple Inc.'s Notice of Motion and Motion for Summary Judgment. I make  
6 this declaration based on my own personal knowledge. If called to testify as a witness, I could  
7 and would do so competently.

8 2. Attached hereto as Exhibit 1 is a true and correct copy of transcript excerpts from  
9 the deposition of Matthew Marx taken November 15, 2013.

10 3. Attached hereto as Exhibit 2 is a true and correct copy of the Apple Inc.'s  
11 Amended Responses to Plaintiffs' Second Set of Interrogatories, dated March 29, 2013.

12 4. Attached hereto as Exhibit 3 is a true and correct copy of the Adobe Systems Inc.'s  
13 Amended Response to Plaintiffs' Second Set of Interrogatories, dated March 19, 2012.

14 6. Attached hereto as Exhibit 4 is a true and correct copy of document produced by  
15 Apple Inc., bearing Bates numbers 231APPLE0002143 through 231APPLE0002144.

16 7. Attached hereto as Exhibit 5 is a true and correct copy of transcript excerpts from  
17 the deposition of Danielle Lambert taken October 2, 2012.

18 8. Attached hereto as Exhibit 6 is a true and correct copy of Plaintiffs' Supplemental  
19 Answers and Objections to Defendants' Second Set of Interrogatories, dated May 24, 2013.

20 9. Attached hereto as Exhibit 7 is a true and correct copy of transcript excerpts from  
21 the deposition of Mark Bentley taken August 23, 2012.

22 10. Attached hereto as Exhibit 8 is a true and correct copy of the Expert Report of  
23 Professor Kevin M. Murphy, dated November 25, 2013.

24 11. Attached hereto as Exhibit 9 is a true and correct copy of transcript excerpts from  
25 the deposition of Ann Reeves taken March 29, 2013.

26 12. Attached hereto as Exhibit 10 is a true and correct copy of transcript excerpts from  
27 the deposition of Eric Schmidt taken February 20, 2013.

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13. Attached hereto as Exhibit 11 is a true and correct copy of transcript excerpts from the deposition of William Campbell taken February 5, 2013.

11. Attached hereto as Exhibit 12 is a true and correct copy of transcript excerpts from the deposition of Ron Okamoto taken February 27, 2013.

12. Attached hereto as Exhibit 13 is a true and correct copy of transcript excerpts from the deposition of Bruce Chizen taken March 15, 2013.

13. Attached hereto as Exhibit 14 is a true and correct copy of Defendant Pixar's Supplemental Objections and Responses to Plaintiffs' Second Set of Interrogatories, dated March 18, 2013.

11. Attached hereto as Exhibit 15 is a true and correct copy of transcript excerpts from the deposition of Brian Croll taken March 22, 2013.

15. Attached hereto as Exhibit 16 is a true and correct copy of Google Inc.'s Responses to Plaintiffs' Second Set of Interrogatories, dated April 6, 2012.

16. Attached hereto as Exhibit 17 is a true and correct copy of transcript excerpts from the deposition of Alan Manning taken November 14, 2013.

I declare under penalty of perjury under the laws of the United States that the above is true and correct. Executed on January 9, 2014, in San Francisco, California.

/s/ Victoria L. Weatherford  
Victoria L. Weatherford